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BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Retail Access Optimization Initiative — Docket No. N2011-1

DIRECT TESTIMONY OF

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ON BEHALF OF

AMERICAN POSTAL WORKERS UNION, AFL-CIO

APWU-T-1

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Autobiographical Sketch

My name is Anita B. Morrison. I am a Founding Principal of Partners for Economic Solutions, an urban economics consulting firm focused on development, including market and financial analysis, economic revitalization strategies and economic impact analysis. Over the past 34 years, I have worked in dozens of communities and business districts, evaluating their conditions and developing strategies to improve the factors affecting their economic health. These assignments have ranged from neighborhood strategies for small cities such as Hopewell, Virginia to development strategies for major mixed-use projects in Baltimore, Orlando and Atlanta. My recent work in neighborhood business district revitalization has included a series of nine areas in the District of Columbia where I assessed market potentials, evaluated redevelopment opportunities and projected the resulting tax revenues for use in tax-increment financing. For Arlington County, Virginia, I assessed retail market potentials for 10 retail districts, evaluating their ability to compete for retail tenants and recommending new retailers that could be brought in to expand the mix in each district. In neighborhood plans for such places as Park Place in Norfolk, Virginia; West Savannah, Georgia; and Georgia Avenue/Petworth in Washington, DC, I worked with the local communities to develop revitalization strategies to preserve and strengthen what they value most.

In my work on major public/private partnerships, I have assisted and represented a number of development agencies, including the District of Columbia Deputy Mayor for Planning and Economic Development, the Pennsylvania Avenue Development Corporation, the Atlanta Development Authority, the Maryland Department of

Transportation, the Fort Monroe Federal Area Development Authority, the Norfolk Redevelopment and Housing Authority, the Orlando Community Redevelopment Agency, the Armed Forces Retirement Home - Washington and the City of Dallas.

I earned a BA in Political Science at the University of Michigan in 1976 followed by a Master of Public Policy from the University's Institute for Public Policy Studies (now the Gerald Ford School of Public Policy) in 1977. I testified before the Postal Regulatory Commission in October 2009 on the Station and Branch Optimization and Consolidation Initiative Docket No. N2009-1.

Partners for Economic Solutions Overview

Partners for Economic Solutions is a full-service urban economics consulting firm dedicated to fostering sustainable economic vitality and growth in America's neighborhoods, cities and regions. Working extensively with cities, economic development and redevelopment agencies, public/private partnerships, universities, housing authorities and non-profits, PES brings real estate and economics expertise to bear on a wide range of urban development and public policy issues.

PES provides advice, strategies and research that are:

- Rigorous, objective and market-driven
- Backed by reliable data
- Drawn from the best national practices
- Tailored to the local situation and resources
- Practical and keyed to specific implementation actions

The firm's services focus on five primary categories:

- Market-driven analysis
- Real estate advisory services

- Economic development and revitalization strategies
- Impact analysis
- Public policy evaluations and strategies

PES is a woman-owned company based in Washington, DC. Its founding principals – Anita Morrison and Abigail Ferretti – have a combined experience of more than 45 years in economic and development consulting.

I. Purpose and Scope of Testimony

Partners for Economic Solutions (PES) analyzed the characteristics of communities served by the post offices, stations and branches being considered for closure under the United States Postal Service Retail Access Optimization (RAO) Initiative. These were compared to the demographics of other randomly selected rural and urban postal communities to test for discriminatory effects on poor, minority and/or elderly residents to assure that the policies and processes do not further disadvantage these groups. Also considered were the effects on community economics. The analysis is followed by recommended changes to the study process and selection criteria to mitigate the effects on these populations.

The following Library Reference is associated with my testimony: APWU-LR-N2011-1/1

II. Review of Post Offices, Stations and Branches Being Studied for Closure

Under my direction, PES reviewed the USPS lists of postal facilities being studied for closure posted on the Postal Regulatory Commission (PRC) website as of August 5, 2011, to profile the demographics of areas surrounding the facilities under consideration for closure.

A. Methodology

The postal facilities being considered for closure include facilities located in both urban and rural communities. The sharp differences in characteristics of land use patterns for rural and urban locations require a different definition of the close-in service area impacted by the potential closing. PES used each postal facility's street address to designate a close-in service area, defined as a one-half-mile radius around the facility

for those located in urban areas and a 20-minute drive time for those locations outside urbanized areas. The definition for urbanized areas represents the Census Bureau's delineation among Urbanized Areas and Urban Clusters.[1]

PES gathered data on a series of economic indicators, including population and household counts, income levels, ethnicity, age, car ownership and other demographic characteristics. The characteristics of the communities with postal facilities under review for closure were compared to averages from a random sample of other urban or rural postal locations to determine disparities between impacted populations and the general population in other postal locations not selected for potential closures. These data, provided in Library Reference APWU-LR-N2011-1/1, were drawn from ESRI, a national Geographic Information System (GIS) and data provider, the 2007-2009 American Community Survey and the 2010 Census.

These sets of randomly selected rural and urban postal facilities served as control groups for comparison. Separate analyses were conducted for rural and urban postal facilities as the character of rural America varies significantly from that of urban areas.

PES examined demographic characteristics associated with the 3,652 Post Offices, branches, stations and annexes being considered for closure.[2] This round of facilities to be studied for possible closure includes:

[1] For Census 2000, the Census classifies as "urban all territory, population and housing units located within an urbanized area (UA or an urban cluster (UC). It delineates UA and UC boundaries to encompass densely settled territory, which consists of:

- Core census block groups or blocks that have a population density of at least 1,000 people per square mile and
- Surrounding census blocks that have an overall density of at least 500 people per square mile.

- 2,825 Post Offices for which earned workload amounted to less than two hours per day and annual revenue no greater than $27,500, referred to as "Low-Revenue Facilities;"
- 384 stations and branches that had earned revenue of less than $600,000 in FY 2010, had less revenue in FY 2010 as compared to the average of the annual revenue earned in FY 2008 and FY 2009, and area located within two miles of at least five alternate access sites, referred to as "Declining-Revenue Stations;"
- 178 retail annexes with annual revenues of less than $1 million in FY 2010 and located within one-half mile of at least five alternate access sites, referred to as "Lower-Volume Annexes;" and
- 265 Post Offices, stations and branches undergoing locally-initiated discontinuance review independently of the Retail Access Optimization (RAO) Initiative, referred to as "Non-RAO Stations".

Demographic data were not available for 114 postal facility areas (listed in Appendix Table A-1). Due to Geographic Information System (GIS) modeling formulae ESRI uses to divide population into small geographic areas for purposes of estimating the demographic characteristics within a drive-time area, these areas were reported to have no population.

The comparisons among the sets of demographics for those locations remaining operational and those potentially subject to closure help to test whether the review

[2] Data from USPS-LR-N2011/1-NP1 and USPS-LR-N2011-1/NP2.

process is fair and reasonable with respect to burdens on minority, low-income and elderly households.

B. Demographic Characteristics of Rural Post Offices

The highlights from this analysis of the 2,891 rural postal facilities[3] being considered for closure (for which data were available) show that they serve a diverse selection of communities. Initial review of the demographic composition of both those rural postal facilities scheduled for closure and the randomly selected control group of rural postal facilities suggests that the postal facilities being considered for closure serve a somewhat higher percentage of low-income households and older residents aged 65 and over.

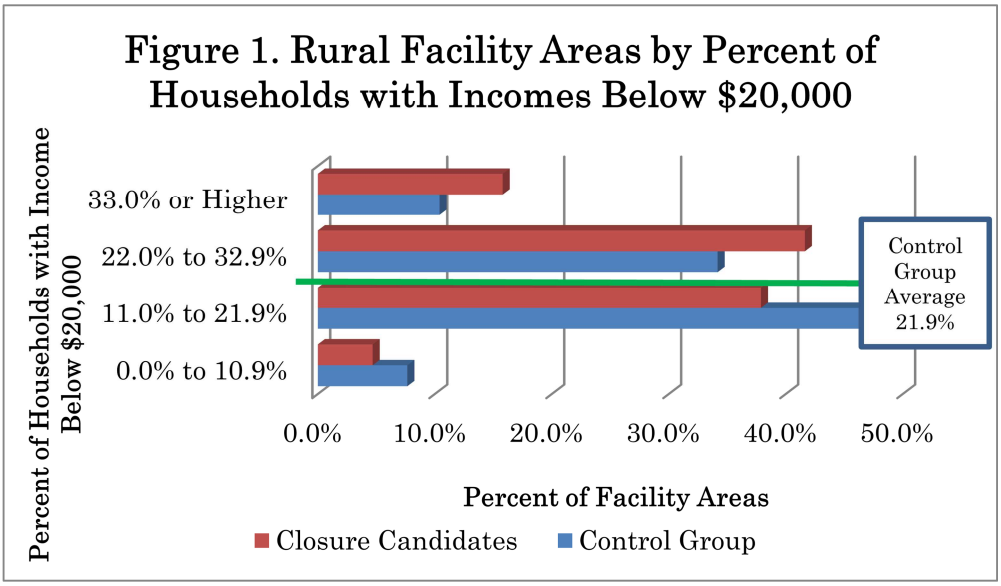
1. Income

Household income provides an important indication of residents' resources. As an indication of low incomes, PES measured the percentage of low-income households as the percentage of households with incomes below $20,000.[4] The control group of rural postal areas has an average of 21.9 percent of households with incomes below $20,000. Among rural areas with post offices being considered for closure, the average is 24.3 percent of households with incomes below $20,000.[5] Fifty-seven percent of those rural areas with post offices being considered for closure have higher shares of low-income households than the average of the control group.

[3] The list of rural facilities being considered for closure included primarily Post Offices but also a small number of postal stations, branches and annexes.
[4] The cut-off of $20,000 was chosen due to the availability of current data.
[5] Significant at 93.0-percent confidence level (p=.0696).

Table 1. Rural Postal Facility Areas by the Percent of Households with Incomes Below $20,000, 2010				
% of Households with Incomes Below $20,000	Rural Control Group		Closing Rural Facilities	
0.0% to 10.9%	142	7.7%	135	4.7%
11.0% to 21.9%	866	46.7%	1,091	37.9%
22.0% to 32.9%	634	34.2%	1,199	41.6%
33.0% or higher	193	10.4%	455	15.8%
Total Areas	1,835		2,880	
Average	**21.9%**		**24.3%**	
Note: Rural Control Group included 1 facility area without household income data. Source: ESRI; Partners for Economic Solutions, 2011.				

In 4.3 percent of facility areas, the share of low-income households is more than double the average of the control group. For example, more than 60 percent of households served by the Wounded Knee, South Dakota Post Office being considered for closure have incomes less than $20,000. The same is true for households served by the Furman, Alabama and Scalf, Kentucky post offices. The breakdown by type of facility being considered for closure is provided in Appendix Table A-2.



2. Vehicle Ownership

In rural areas, where the nearest post office can be 10 or more miles away, the distance to the post office for some patrons will increase significantly. Information provided by USPS for 2,929 of the rural post offices proposed for closure indicates a wide range of driving distances to the nearest post office. Two areas have access to another post office only by boat – Cliff Island and Matinicus in Maine. One-third of the post offices being considered for closure are more than 10 miles from the nearest post office, and 1 out of 10 is more than 20 miles away. Seven post offices are more than 80 miles to the nearest post office.

Table 2. Rural Post Offices by Distance to the Nearest Station

Distance to Nearest Station	Number	Percent
2.0 miles or less	129	4.4%
2.1 to 5.0 miles	683	23.3%
5.1 to 10.0 miles	1,144	39.1%
10.1 to 20.0 miles	688	23.5%
20.1 to 30.0 miles	179	6.1%
30.1 to 40.0 miles	60	2.0%
40.1 to 60.0 miles	27	0.9%
60.1 to 80.0 miles	10	0.3%
80.0 to 283.0 miles	7	0.2%
8.0 to 20.0 miles by boat	2	0.1%
Total	2,929	100.0%

Note: No distance information available for 72 post offices.
Source: USPS-LR-N2011/1-NP7; Partners for Economic Solutions, 2011.

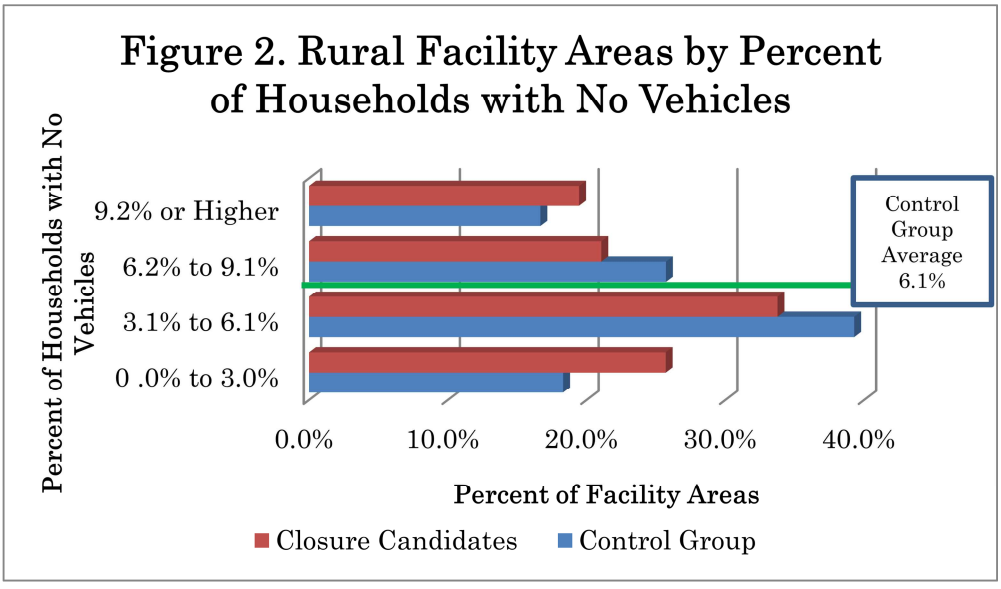
For residents who currently walk to the post office, those who do not own automobiles will be hurt most. In the rural area control group, an average of 6.1 percent

of households have no vehicles. The areas surrounding the rural post offices being considered for closure have an average of 6.3 percent of households with no vehicles. Higher levels of households with no vehicles correlate with low income levels. The 39 rural postal facility areas with an average of 20 percent or more of households with no vehicles have an average of 31.2 percent of households with incomes below $20,000, 50 percent higher than the control group average.

Table 3. Rural Postal Facility Areas by the Percentage of Households with No Vehicles, 2010

% of Households with No Vehicles	Rural Control Group		Closing Rural Facilities	
0 .0% to 3.0%	336	18.3%	737	25.7%
3.1% to 6.1%	721	39.3%	968	33.8%
6.2% to 9.1%	472	25.7%	604	21.1%
9.2% or Higher	306	16.7%	558	19.5%
Total Areas	1,835		2,867	
Average	**6.1%**		**6.3%**	

Note: Rural Control Group included 14 facility areas without vehicle data.
Source: ESRI; Partners for Economic Solutions, 2011.



Within the candidates for potential closure, 8.5 percent of facility areas have a car-less rate double that of the control group, and 1.0 percent have a rate triple the control group average. Appendix Table A-3 shows the percent of households with no vehicles by type of facility being considered for closure.

3. Age

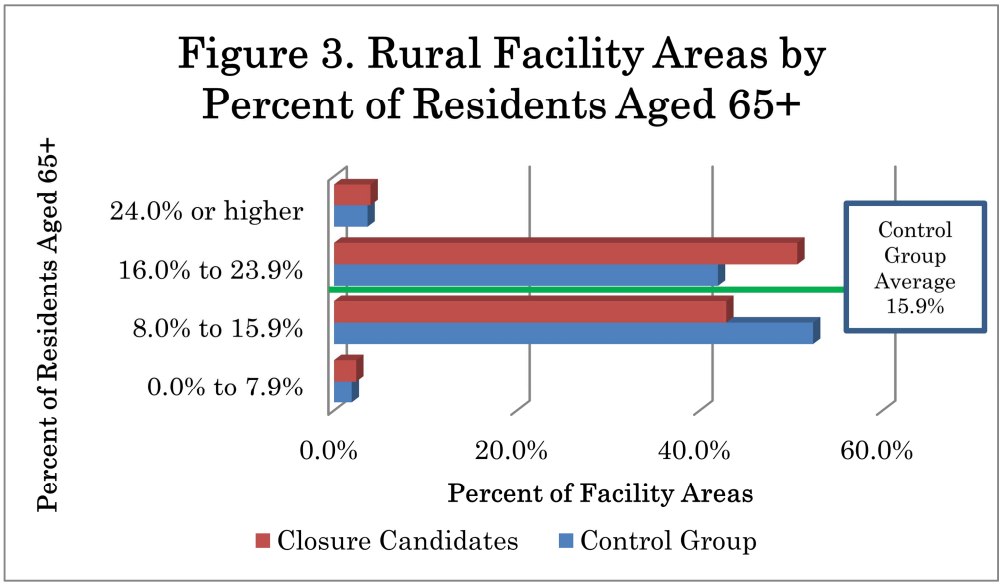
Older residents may have greater trouble in traveling additional distances to access postal services. Clusters of residents aged 65 and over may suggest that the postal facility closure will cause undue burdens. Within the rural control group, the average facility area has a population that is 15.9 percent aged 65 and older. Of the rural areas impacted by proposed closures, the average is 16.4 percent of the population aged 65 and older.[6]

Table 4. Rural Postal Facility Areas by Percent of Population Aged 65 and Over, 2010

% of Population Aged 65+	Rural Control Group		Closing Rural Facilities	
0.0% to 7.9%	36	1.9%	70	2.4%
8.0% to 15.9%	972	52.4%	1,236	42.9%
16.0% to 23.9%	779	42.0%	1,460	50.7%
24.0% or higher	68	3.7%	115	4.0%
Total Areas	1,855		2,881	
Average	**15.9%**		**16.4%**	

Source: ESRI; Partners for Economic Solutions, 2011.

[6] Significant at 99.999-percent confidence level (p=.0000058).

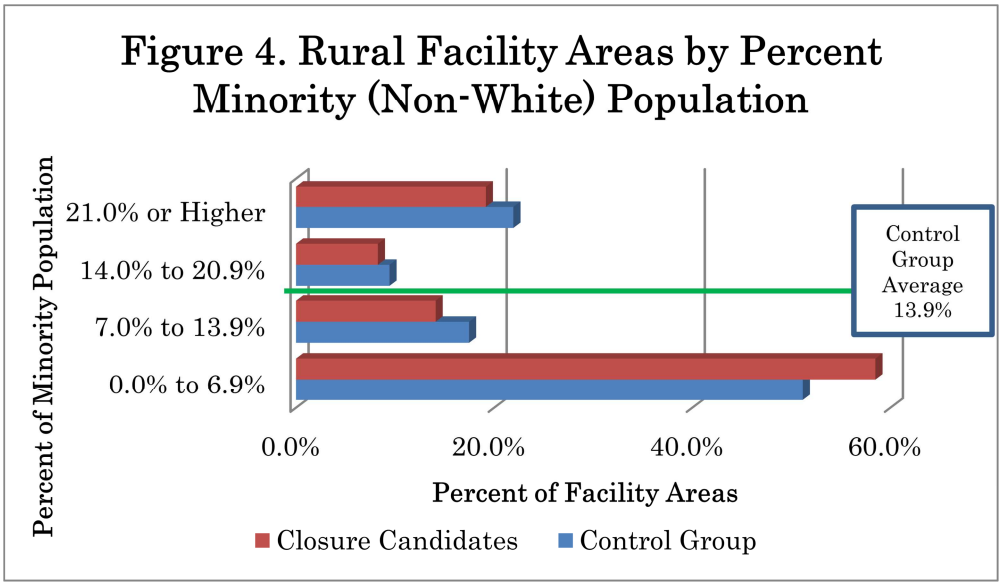


Some post offices serve a much older population. Ten post offices serve populations that range from one-third to one-half aged 65 and over, including Bluffton, Texas; Oysterville, Washington; Wiseman and Oakland, Arkansas; and Lehr, North Dakota. As shown in Appendix Table A-4, the share of population aged 65 and over does not vary significantly by type of facility being considered for closure.

4. Ethnicity

The rural closures being considered do not appear to have a disproportionate impact on minority populations. Examining the profiles of close-in residents around each of the postal facilities being studied for closure indicates that they have an average of 12.9 percent minority residents. This compares with the average of 13.9 percent of rural facility areas in the control group not being considered for closure. However, 80 of the affected rural facility areas have minority populations greater than two-thirds of the total population. Appendix Table A-5 shows the breakdown by type of facility being considered for closure.

Table 5. Rural Postal Facility Areas by the Percentage Minority (Non-White) Population, 2010				
% of Population Minority	Rural Control Group		Closing Rural Facilities	
0.0% to 6.9%	949	51.2%	1,685	58.5%
7.0% to 13.9%	324	17.5%	406	14.1%
14.0% to 20.9%	175	9.4%	238	8.3%
21.0% or Higher	407	21.9%	552	19.2%
Total Areas	1,855		2,881	
Average	**13.9%**		**12.9%**	
Source: ESRI; Partners for Economic Solutions, 2011.				



C. Demographic Characteristics of Urban Facilities

The demographic disparities among urban facilities being considered for closure as compared with the control group suggests that the process may have discriminatory impacts. Close-in neighborhoods being served by post offices, postal stations, branches and annexes being considered for closure have significantly higher numbers of low-income households, households that do not own cars and minority residents.

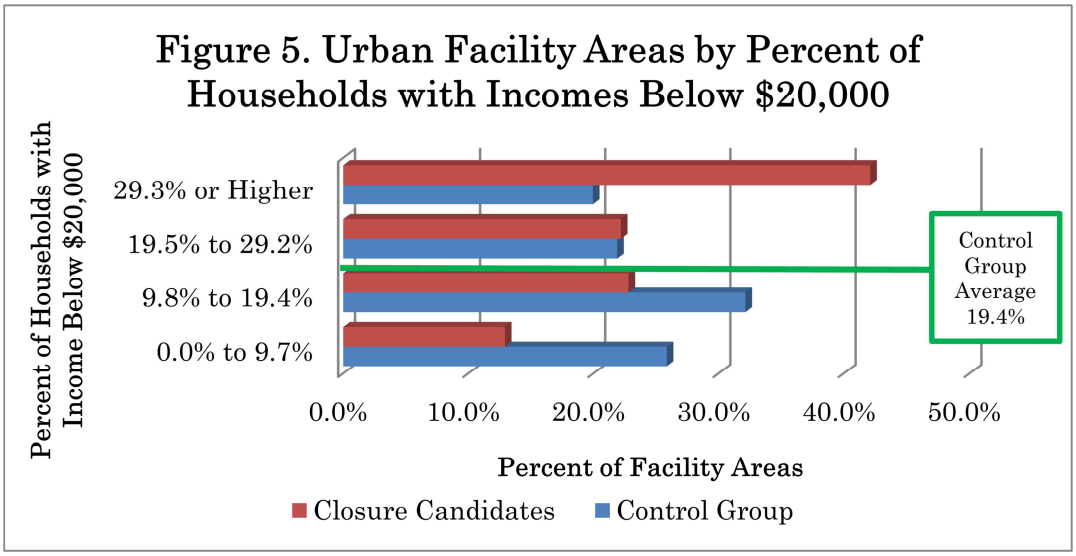
1. Income

Urban areas served by postal facilities being considered for closure serve distinctly less affluent service areas than do postal facilities in the control group. The control group of urban postal facility areas has an average of 19.4 percent of households with incomes below $20,000. Among urban areas with facilities being evaluated for closure, the average is 27.0 percent of households with incomes below $20,000. Sixty-four percent of urban areas with postal facilities being considered for closure have larger low-income populations than does the control group. More than 22 percent have averages more than double that of the control group station areas. Nineteen facility areas (2.9 percent) have triple the share of low-income households when compared to the control group average. Shown in Appendix Table A-6, there are only small differences in the share of low-income households when considered by type of facility proposed for closure.

Table 6. Urban Postal Facility Areas by the Percent of Households with Incomes Below $20,000, 2010

% of Households with Incomes Below $20,000	Urban Control Group		Closing Urban Facilities	
0.0% to 9.7%	333	25.9%	85	12.9%
9.8% to 19.4%	414	32.1%	150	22.8%
19.5% to 29.2%	282	21.9%	146	22.2%
29.3% or Higher	257	20.0%	277	42.1%
Total Areas	1,286		658	
Average	**19.4%**		**27.0%**	

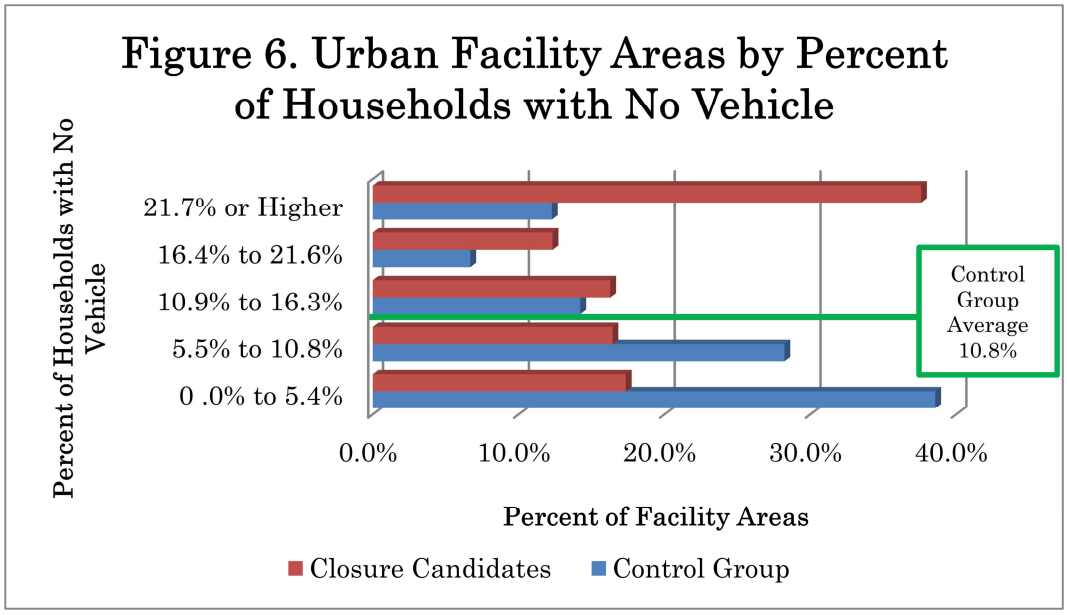
Source: ESRI; Partners for Economic Solutions, 2011.



2. Vehicle Ownership

Urban areas attract a much higher share of households with no vehicles. In the urban area control group, the average facility area has 10.8 percent of its households with no vehicles. The areas surrounding the urban postal facilities being considered for closure have an average almost double that – 21.1 percent of households with no vehicles. In 44 facility areas (6.7 percent), at least one-half of resident households have no car. In some cases, this relates to the availability of transit services, difficult and expensive parking, and a compact development pattern that allows residents to access services on foot. As importantly, low incomes among urban households limit their ability to afford a car. As shown in Appendix Table A-7, the share of households without cars is lowest in areas around low-revenue post offices and highest in areas around low-volume retail annexes.

Table 7. Urban Postal Facility Areas by the Percentage of Households with No Vehicles, 2010				
% of Households with No Vehicles	Urban Control Group		Closing Urban Facilities	
0 .0% to 5.4%	496	38.6%	114	17.4%
5.5% to 10.8%	363	28.2%	108	16.4%
10.9% to 16.3%	183	14.2%	107	16.3%
16.4% to 21.6%	86	6.7%	81	12.3%
21.7% or Higher	158	12.3%	247	37.6%
Total Areas	1,286		657	
Average	**10.8%**		**21.1%**	
Note: Urban Control Group included one facility area without vehicle data. Source: ESRI; Partners for Economic Solutions, 2011.				



3. Age

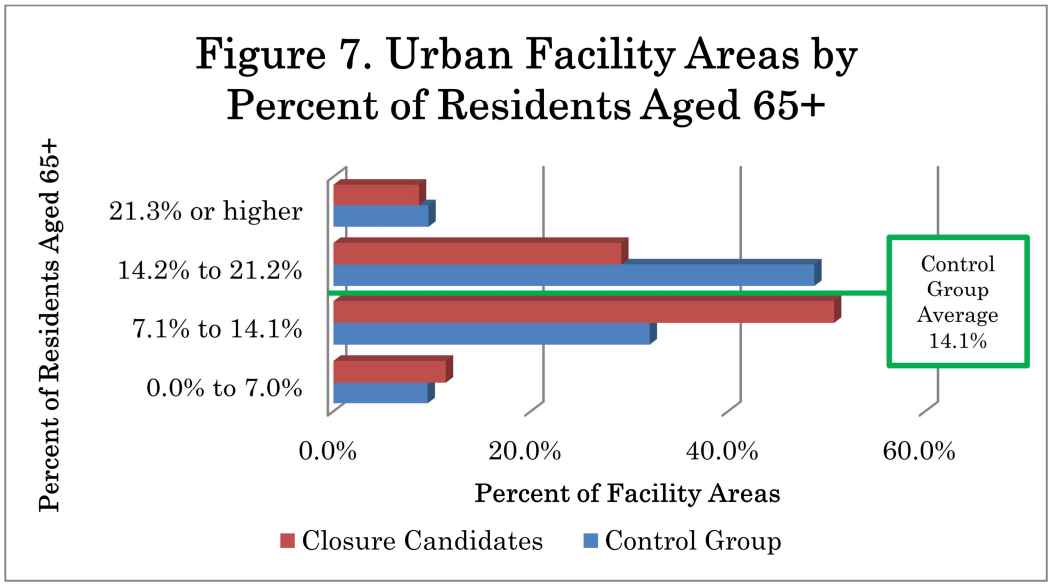
Older residents may have greater trouble in traveling additional distances to access postal services. The areas served by urban postal facilities being considered for closure have a typically younger population than the control group of urban postal facilities not being closed. Within the urban control group, the average station area has a population that is 14.1 percent aged 65 and older. In the urban areas impacted by

proposed closures, the average is 13.4 percent of the population aged 65 and older. There are outlier facility areas that should be considered, such as the retail annex at Leisure World, a retirement community in Silver Spring, Maryland. Appendix Table A-8 shows that the share of population aged 65 and over is lowest in areas around declining-revenue stations and low-volume retail annexes.

Table 8. Urban Postal Facility Areas by Percent of Population Aged 65 and Over, 2010

% of Population Aged 65+	Urban Control Group		Closing Urban Facilities	
0.0% to 7.0%	123	9.5%	75	11.4%
7.1% to 14.1%	413	32.1%	334	50.8%
14.2% to 21.2%	628	48.8%	192	29.2%
21.3% or Higher	124	9.6%	57	8.7%
Total Areas	1,288		658	
Average	**14.1%**		**13.4%**	

Source: ESRI; Partners for Economic Solutions, 2011.



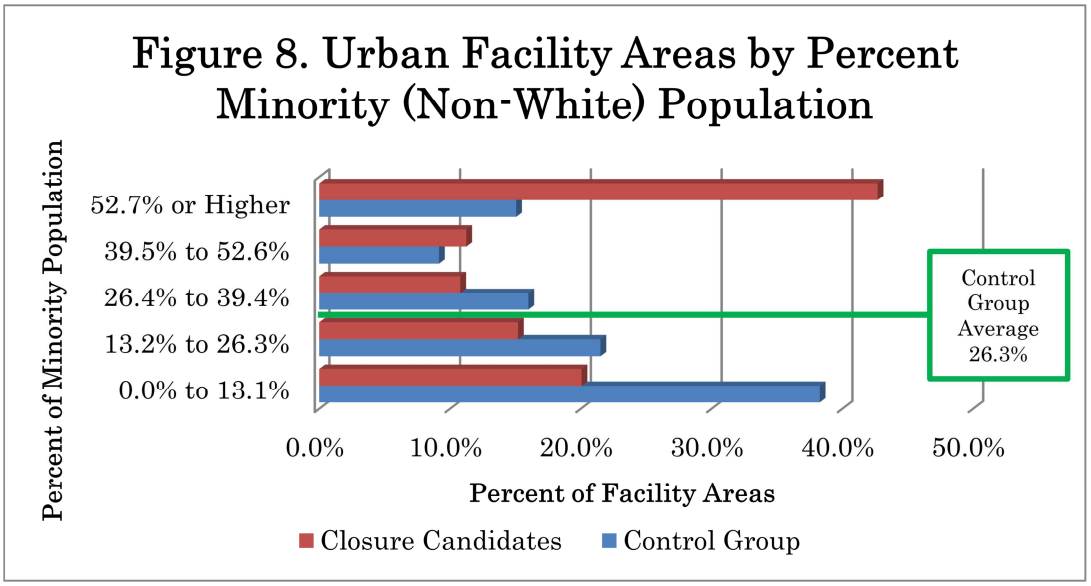
4. Ethnicity

Urban facility areas show the greatest disparity relative to ethnicity. Close-in areas around the stations, branches and annexes being studied for closure have an average of 45.1 percent minority (non-white) population in contrast to the average of 26.3 percent of urban facility areas in the control group not being considered for closure. Nearly 42 percent of the urban facilities being considered for closure have minority populations more than double the average of the control group facility areas. Almost one-quarter of the residents of close-in areas surrounding postal facilities being considered for closure are at least 75 percent minorities. The percentage of minority population is 20 percent higher in areas surrounding declining-revenue stations than in the total inventory of urban facilities being considered for closure.

Table 9. Urban Postal Facility Areas by the Percentage Minority (Non-White) Population, 2010

% of Population Minority	Urban Control Group		Closing Urban Facilities	
0.0% to 13.1%	493	38.3%	132	20.1%
13.2% to 26.3%	277	21.5%	100	15.2%
26.4% to 39.4%	206	16.0%	71	10.8%
39.5% to 52.6%	118	9.2%	74	11.2%
52.7% or Higher	194	15.1%	281	42.7%
Total Areas	1,288		658	
Average	**26.3%**		**45.7%**	

Source: ESRI; Partners for Economic Solutions, 2011.



III. Economic and Community Development Impacts

A. Economic Role of Post Offices in Local Communities

In urban areas, postal facilities anchor neighborhood business districts and suburban downtowns, attracting people to the business district on a daily basis to conduct their postal business, frequent other businesses and eat lunch. They function much in the same way that a department store draws customers for other mall stores. The postal facility gives patrons the impetus to visit the business district more frequently than they would otherwise, providing the local retail and service establishments exposure to a steady stream of customers. That flow of customers makes the business district more attractive to prospective retail tenants, supporting higher occupancy and rents for existing retail storefronts.

In smaller rural communities, the local post office plays an even more pivotal role. For many, the presence of a post office is what gives the town its identity, validating the town through official recognition of its existence. "Post offices and town

councils put us on the map."[7] In communities with no rural route delivery service, residents come to their post office boxes every day or so. This daily ritual brings people together informally on neutral ground, reinforcing the bonds of their communities. In many of the press stories about the proposed post office closures, residents refer to the post office as a "community center." The Kansas Sampler Foundation noted "In some cases the post office is the only business left in the town. It's where people meet each day. It's the place for news. It's the evidence that 'we are still a town.'"[8]

B. Economic Development Effects of Losing a Post Office

With the loss of such an important activity generator, one would expect to see lower retail and service sales by local businesses. As the closing postal facility's former patrons frequent other postal facilities, they may find retailers in those areas are more convenient for one-stop shopping, diverting their sales from the original neighborhood business district. Depending on the extent of post office activity, these sales declines may be modest. However, even a 10-percent decline in sales can make the difference between profitability and business failure.

Lower sales translate into a reduced ability to pay market rents, which may force landlords to accept lower rents or higher vacancies. With a reduced rental cash flow, a landlord may choose to forego reinvestment and property upgrading over time. This neglect then contributes to a cycle of neighborhood decline as buildings deteriorate and

[7] Pastor Timothy Miille of Blackburn, Missouri quoted in "Residents fear loss of local post offices could doom towns," *The Marshall Democrat-News*, September 8, 2011, accessed at http://www.marshallnews.com/story/1760629.html.

[8] Kansas Sampler Foundation quoted in "What others say: Closing post offices targets a town's identity," *The Wichita Eagle,* August 11, 2011, accessed at http://www.columbiamissourian.com/stories/2011/08/11/what-others-say-fight-back-closing-post-offices-target-towns-identity/

are abandoned, posing public safety concerns. In turn, these trends undermine the performance of remaining businesses and supportable rent levels.

Initial research prepared for the Postal Regulatory Commission by the Urban Institute found a "small, sometimes significant, negative impact on employment in the ZIP codes with post office closures."[9] The analysis compared the number of jobs and businesses in ZIP codes that lost their post offices between 2002 and 2005 to similar communities elsewhere in the same metropolitan area or comparable geography. Data from the U.S. Census Bureau's ZIP Business Patterns Database, 2000 to 2008, provided the key inputs to the analysis. "All models produced a similar negative magnitude of impact from a post office closure of roughly six jobs lost in the ZIP code, with modest variation across the models in standard errors and statistical significance."[10] However, they "did not provide conclusive evidence of economic impact."[11] The analysts recommend further research with a larger number of post office closures and jobs data on a smaller geography than ZIP codes. They postulate that "the size variation of ZIP codes may be a driving force behind the large standard errors."[12]

C. Impacts on Customers

Depending on each postal facility's situation, the impact on customers can be significant. Customers who depend on daily visits to pick up their mail from a post office box will find themselves inconvenienced.

[9] Christopher Hayes, Christopher Narducci and Nancy Pindus, "Economic Effects of Post Offices Final," August 2011, Washington, DC., 1.
[10] Hayes 9.
[11] Hayes 10.
[12] Hayes 10.

Retail alternative opportunities can fill some gaps but are unlikely to replace completely the services of a post office or postal station. Rural delivery to a cluster of mailboxes can provide daily access to delivered mail, but will not provide much help with outgoing mail. Residents who receive their prescription medicines by mail will no longer have the security of a temperature-controlled post office box. Leaving packages for rural carrier pickup at a mailbox cluster risks damage from the weather and/or theft. Finding a local store that can take on some postal retail functions[13] – selling a small variety of stamps, accepting pre-paid packages, etc. – may not be possible in some rural communities. For example, Franklin, Missouri is a small town with no local businesses other than the post office.[14] Cliff Island, Maine is a town of 45 residents, which grows to 200 during summer months.[15] Other than the post office, no local businesses are open year-round, so no retail alternative would be possible. The nearest post office or year-round business is eight miles or a two-hour ride by ferry.

Currently, many of the retail alternatives considered in the evaluation of alternative opportunities for postal services are retailers who sell books of first-class postage stamps but provide no other postal services.

Entrepreneurs who run small businesses in rural locations often depend on their local post office to deliver their merchandise to customers. Extending their market via

[13] CPUs and the VPOs are contracted for limited services – far short of the full array of services offered at a post office, station or branch. See USPS Response to DBP/USPS-6 (August 4, 2011) TR.1/50.

[14] Sarah Hoffman, "Small town residents saddened by prospect of post offices closing," *Columbian Missourian*, August 3, 2011. Accessed at http://www.columbiamissourian.com/stories/2011/08/03/post-offices-rural-missouri-are-evaluated-closure/.

[15] Tom Porter, "Maine's Threatened Post Offices," *The Maine Public Broadcasting Network,* August 2, 2011. Accessed at http://www.mpbn.net/News/MaineNewsArchive/tabid/181/ctl/ViewItem/mid/3475/ItemId/17472/Default.aspx.

the Internet allows them to earn a living from a rural location. The additional cost and time in having to drive to a staffed post office for packages that need special handling or don't work with pre-paid boxes could be a burden to these companies. Converting from a local post office to curbside delivery will impose costs on local residents and businesses, including purchase and installation of a mailbox and the time and cost involved with changing one's address, notifying one's contacts and printing new business cards and stationery.

For rural residents, the greatest loss may be the damage to their town's social cohesion. Daily encounters with other town residents at the post office help to cement social relationships. The daily visit to pick up mail encourages the elderly to get out and avoid total isolation. The rural postmaster often alerts relatives or friends to the fact that someone has not been in to collect his or her mail and may need assistance.

Post office services are particularly important for residents who have no checking or savings accounts – the "unbanked." Postal money orders are an essential means to pay their bills. The Postal Regulatory Commission funded a research study by Joy Leong Consulting, LLC entitled "*Study on USPS Money Transfer Services for the Unbanked."* Citing Federal Deposit Insurance Corporation (FDIC) data[16], it reports that "7.7 percent of U.S. households or 9 million are 'unbanked.'… A disproportionately large number of these households are minority and low income."[17] The FDIC reports that "[n]early 20 percent of lower-income U.S. households—almost 7 million households

[16] FDIC National Survey of Unbanked and Underbanked Households, December 2009 at http://www.fdic.gov/householdsurvey/full_report.pdf .
[17] Joy Leong Consulting, LLC. "Study on USPS Money Transfer Services for the Unbanked." PRC109909-10-Q-0021. p.1. Accessed at http://www.prc.gov/prc-docs/home/whatsnew/Unbanked_Report.pdf

earning below $30,000 per year—do not have a bank account."[18] The unbanked are disproportionately Black (36.9 percent) and Hispanic (28.1 percent).[19] For the unbanked, money orders are a necessity. While banks and some retailers also sell money orders, small rural communities often have no bank or even retailers. International money orders are particularly important to immigrants sending money back to relatives.

In urban areas, neighborhood postal facilities allow many residents to walk to do their postal business. Closure in favor of another station even just two miles away will create a significant burden for those residents that don't own cars. As noted earlier, 21 percent of resident households living within a 0.5-mile radius of the urban postal stations proposed for closing have no vehicles. Even assuming the availability of bus service, the inconvenience will carry a significant cost in bus fares, particularly when compared to household income when 27 percent of households near to a closing urban postal station have incomes of $20,000 or less.

Leaving a package for pickup by the postal carriers is not a viable option for many urban residents in low-income neighborhoods. Dropping a package in the corner mailbox or cluster mailbox is also problematic due to allowable weight limits and the declining number of mailboxes.

While postal services via the Internet reduce the need for post office visits, many low-income residents have little or no access to computers and the Internet. The Pew Research Center's Internet & American Life Project has documented significant increases in Internet use over the last decade. Its report *"Change in internet use by*

[18] FDIC 11.
[19] FDIC 18.

age, 2000-2010" [20] indicates that Internet use among teens aged 12 to 17 has increased from 76 percent in 2000 to 93 percent by 2009. Ninety-five percent of adults aged 18 to 29 use the Internet. However, Internet use is limited to 78 percent of adults aged 50 to 64 and only 42 percent of adults 65 and over. While adoption of Internet use among African-Americans has increased significantly in the last two years, it still remains at 67 percent – 11 percent lower than the total adult population. Among households with annual incomes below $30,000 per year, adult Internet use is only 63 percent. Rural adults' use is 72 percent as compared with 79 percent among urban adults and 80 percent among suburban adults.

Availability of broadband service in the home reached 66 percent of adults in 2010 with another five percent accessing the Internet via dial-up service.[21] Distinct demographic disparities exist in access to home broadband service. Only 31 percent of residents aged 65 and older had home broadband access in contrast to 80 percent of adults aged 18 to 29. Fifty-six percent of African-Americans had access to home broadband as compared with 67 percent of non-Hispanic whites and 66 percent of Hispanic households. Among households with annual incomes below $30,000 home broadband was available to only 45 percent of households versus 79 percent of households with incomes between $50,000 and $75,000. One-half of rural households reported access to home broadband service in comparison with 70 percent of non-rural households.

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[20] Pew Internet & American Life Project, "Change in internet use by age, 2000-2010." Accessed at http://pewinternet.org/infographics/2010/Internet-access-by-age-group-over-time-Update.aspx and http://pewinternet.org/Trend-Data/Whos-Online.aspx.

[21] Aaron Smith, Pew Internet & American Life Project, "Home Broadband 210," Washington, D.C., August 11, 2010, 7-8. Accessed at http://pewinternet.org/Reports/2010/Home-Broadband-2010.aspx.

The Federal Communications Commission (FCC) reports that "3.8 million people in rural areas have no mobile broadband access" and only 81.6 percent of rural U.S. square miles is estimated to have mobile broadband coverage.[22]

Many rural states suffer from broadband networks with relatively slow download speeds. A recent study by Pando Networks measured average download speed by state. It found that Rhode Island, for example, had an average download speed 2.8 times as fast as the average for Idaho (894 versus 318 Kilobytes per second). "The slowest downloading towns tend to be in rural areas with low incomes."[23]

Potential use of the Internet for postal services is limited for many households by their lack of a credit card. Most major credit card companies require annual household income in excess of $30,000 to obtain credit. If lenders do extend credit, it typically comes with higher interest rates and more fees for minorities and low-income households. Even debit cards may be hard to come by for many low-income households that live paycheck to paycheck and do not have checking or savings accounts. "Twenty-five percent of households in the lowest income quintile have credit access problems, and more than one-third of single-parent households and black households have credit access problems."[24]

[22] Federal Communications Commission, *Annual Report and Analysis of Competitive Market Conditions with Respect to Mobile Wireless, Including Commercial Mobile Services*, WT Docket Nol. 10-133 (Terminated), June 24, 2011, 218-219.
[23] Pando Networks, "Data analysis reveals disparity in US Internet speeds, download completions," July 21, 2011, Accessed at: http://www.pandonetworks.com/Pando-Networks-Releases-Nationwide-ISP-And-Network-Study.
[24] Rebecca M. Blank and Michael S. Barr, Editors, *Insufficient Funds: Savings, Assets, Credit, and Banking Among Low-Income Households* (New York: 2009) 37.

IV. Review Process Recommendations

The importance of a local post office to residents and nearby businesses underscores the need for a sound, deliberative and inclusive process for identifying and evaluating candidate facilities for closing.

In selecting post offices, stations, branches and retail annexes to be considered for closure under the current RAO Initiative, the Postal Service used earned workload, annual revenue, whether revenues are declining, and distance to postal retail and/or alternate access sites criteria to identify candidate stations. An additional 265 postal facilities that were undergoing locally-initiated discontinuance review independently of the RAO Initiative also are now being subjected to the RAO Initiative process as outlined in the USPS Handbook PO-101 (effective July 14, 2011)[25]. However, the public is not allowed online access to this handbook, so the process is not widely known.

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[25] The *PO-101 Postal Service-Operated Retail Facilities Discontinuance Guide* states:
242.14 "Customers should be provided a deadline, five to seven days from the day of receipt, to enter their feedback online or return the printed questionnaire. Customers should also be provided a phone number for the district Consumer & Industry Contact Office and the PO Box address designated for discontinuance communications. Written comments may be hand-delivered to the local postmaster, OIC, or other responsible personnel, who should forward such comments to the Manager, Consumer and Industry Contact.

"The Manager, Consumer & Industry Contact, is responsible for answering customer questionnaires, as appropriate, and ensuring that the Discontinuance Coordinator is provided copies of all customer letters and responses, which become part of the official record. When appropriate, certain personally identifiable information, such as individual names, and residential addresses and telephone numbers, may be redacted from the publicly accessible copy of the record. See subchapter 26 for how to handle customer comments.

243 "After the response deadline expires, the Discontinuance Coordinator timely prepares a questionnaire analysis. Maintain copies of returned questionnaires and response letters for inclusion in the official record, including those submitted after the deadline. (Written customer comments submitted at any time, and responses, should always become part of the official record.)"

A cover letter and questionnaire will be sent to each postal customer to inform them of the on-going analysis. Feedback will be solicited online, through written questionnaire and telephonic conversations with USPS staff. Responses are to be provided to each comment. A community meeting is to be held to discuss the closure review process and the alternatives that will be available to customers. Following the 60-day review period, staff will prepare a proposal that considers responsiveness to community postal needs, effects on community and employees, economic savings and other factors.

Additional factors should be considered in evaluating stations for closure:

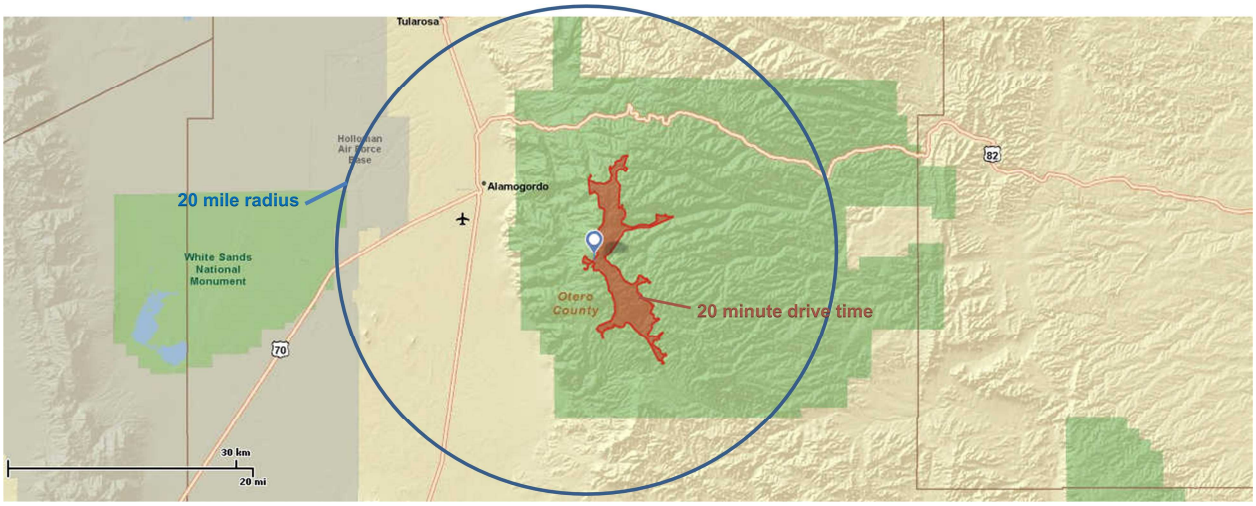
- the demographics of nearby residents and the potential impact that poverty, age and other factors may have on residents' ability to access alternative postal facilities;
- the extent of mail order sales and whether there are alternative providers;
- driving times, the availability of a car to drive to the nearest station, and the ease of pedestrian access to the nearest postal facility;
- the adequacy of alternative retail access options to accept delivery of packages, sell money orders and accept non-prepaid packages;
- the impact on the community business district; and
- the burdens imposed on residents as a result of closure.

Inclusion of a brief demographic profile, detailing the population and businesses currently served, would provide important information for decision makers. It should highlight areas for which the closure of the postal facility may significantly impact low-income residents, households that do not own cars and/or elderly residents. Given the

importance that money orders have for unbanked low-income households, the number of money orders issued should be given due weight in the analysis of workload.

The alternative retail access option of a contractor-operated “Village Post Office” is focused on selling stamps and pre-paid Flat Rate packaging. It will not address the problem of delivering packages that will not fit in the cluster mailbox receptacle. It also will not sell money orders. Given the limited services to be provided, the presence of a “Village Post Office” should not override the issues of distance and time to travel to another full service post office. Customers will still need to travel sometimes long distances to a full service post office when they need to send registered mail, certified mail or mail that requires special handling, a return receipt or a certificate of mailing.

An assessment of the physical landscape and routes to the nearest post office could assist in understanding pedestrian, transit and auto travel patterns. The Postal Service has provided data on the distance in miles to the nearest post office. For several rural areas, travel time may be a more appropriate measure given topographic conditions that slow travel. Travel times can be much longer than one might expect just by looking at the distances involved because of topography and road conditions, particularly in the winter. ESRI’s GIS database estimates driving times based on posted speed limits and the classification of road. The following map of the 20-minute drive time area around the Sunspot Post Office in New Mexico shows how much smaller the area within a 20-minute drive time can be than a 20-mile radius.



In urban areas, walkability is a greater issue. An elderly person may be unable to walk to the next closest post office because the access to this post office does not incorporate a friendly, safe or easily traversed path. The National Complete Streets Coalition identifies the many constraints on walkability:

> Unfortunately, many roads do not provide safe alternatives to driving. Crossings are long, sidewalks are absent, and transit stops have no place to sit. A national poll found 47% of Americans over 50 said they could not cross main roads near their home safely. Almost 40% said their neighborhoods do not have adequate sidewalks, while another 55% reported no bike lanes or paths, and 48% reported no comfortable place to wait for the bus.[26]

A. Soliciting Feedback

The Postal Service gathers information from customers and interested stakeholders without a specified forum for sharing initial feedback with the public. The revised USPS Handbook PO-101 public notification and consultation process includes distribution of questionnaires to postal patrons, receipt on feedback online and community meetings. While an improvement over the process used in the prior PO-

[26] National Complete Streets Coalition, 2009, www.completestreets.org.

101, which required customers to request questionnaires to provide feedback, further improvement is possible and warranted.

1. Informational Materials

USPS Handbook PO-101 or a similar detailing of the process for considering closures should be made available to the public online so that residents would have better information on how the analysis and decision-making will proceed.

Public feedback and input would be enhanced if the public were better informed about the details of the planned alternative service. The initial statement from the Postal Service provides some information but little detail about retail access options, whether the residents would be offered cluster mailboxes or curbside delivery and no explanation of the analysis that backs up the cost savings estimate. Customers seeking to influence the closure decision have no access to the information that would allow them to offer meaningful alternatives, such as Town provision of the post office space, and to know whether that would make a difference to the bottom-line cost.

The business case for closing a particular post office, station, branch or annex should be provided during the closure evaluation process in sufficient detail that residents can review and understand the back-up analysis. Included should be:

- the cost of providing rural carrier service to residents' homes or cluster mailboxes;
- the cost of additional labor required at the nearest postal station that will take on the responsibilities formerly handled by the local postmaster;
- the expenses saved by eliminating local post office labor, rent and occupancy costs; and

- whether savings could be achieved by reducing the hours of operation.

2. Website

A website page should be provided for each proposed closure with updated information, including scheduled meetings, and direct links to the on-line survey and other options for providing further feedback.

Posting of the USPS responses to comments, questions and concerns on an ongoing basis during the comment period would be very helpful to customers seeking to understand and influence the process. USPS responses should be specific and not boilerplate.

B. Options

Customers will be provided services through other post offices and/or alternative retail options; however, pedestrian accessibility to these alternatives must be considered. Data are readily available that would allow the Postal Service to identify service areas with large numbers of customers without access to a car. In those cases, particular attention should be given to the adequacy of pedestrian access to those alternative postal facilities. In urban areas, the USPS should be required to demonstrate pedestrian accessibility to another postal facility within one-half mile. In cases where pedestrian access is not possible due to distance or barriers (e.g., highways, rivers), mitigation strategies should be considered. These might include period dispatch of a mobile van providing postal services and/or installation of post office boxes in a local facility, such as the lobby of an assisted living facility.

Serious consideration should be given to operating rural post offices with reduced hours. Information provided by the USPS indicates that two-thirds of the rural post offices being considered for closure are open for eight hours or more each day.

Table 10. Rural Post Offices by Number of Hours Open

Daily Hours	Number	Percent
2.0 hours or less	46	1.5%
2.1 to 4.0	216	7.3%
4.1 to 6.0	289	9.7%
6.1 to 8.0	464	15.6%
8.1 to 10.0	1,942	65.4%
10.1 or more	12	0.4%
Total	2,969	100.0%

Note: No hours information available for 12 post offices.
Source: USPS-LR-N2011/1-NP6; Partners for Economic Solutions, 2011.

Only nine of the rural post offices being considered for closure are open for less than five days per week. Alternatives should be considered that include reducing the daily hours of operation and/or the number of days open. Postmasters or postal clerks could act as "circuit riders," working in more than one post office during a week. Though less convenient than full-time operations, this could still be much more convenient for customers in locations some distance from the nearest post office.

Table 11. Rural Post Offices by Number of Days Open		
Weekly Days Open	Number	Percent
1	1	0.0%
2	-	0.0%
3	4	0.1%
4	4	0.1%
5	2,960	99.7%
Total	2,969	100.0%

Note: No hours information available for 12 post offices. No hours information available for Saturdays.
Source: USPS-LR-N2011/1-NP6; Partners for Economic Solutions, 2011.

V. Conclusion

The profile of urban postal stations and branches being considered for closure provides statistical evidence that the study process discriminates against communities with high percentages of low-income, minority and transit-dependent residents. Closure of a branch post office can have significant negative impacts on local business districts, particularly in walkable neighborhoods.

The rural post offices being considered for closure do not differ as greatly from other rural post offices in terms of the populations they serve. However, losing a local post office can be a major blow to a small town, imposing significant burdens on individuals forced to drive 10 or more miles to the next post office to pick up their packages or buy money orders.

I recommend the following modifications to the closure review process:

- The Postal Service should consider the demographic profile of areas served by closure candidates to assure that low-income households, minorities and the elderly are not impacted disproportionately.
- Where customers are asked to shift to other nearby facilities, a walkability analysis should be undertaken to ensure that residents without cars can actually access those facilities.
- In rural areas, driving times should be considered as well as driving distances to the alternative postal facility.
- More complete information should be shared with the public in a timely fashion so that customers can fully understand the retail options being offered, the analytical basis for estimated cost savings and other factors influencing the closure decision.
- Responses to customer comments, concerns and questions should be posted in a timely fashion for customers to read during the review process. These responses should be specific to the question or concern as well as the community. For example, the Postal Service should not respond to a concern about access with a boilerplate response citing the national usage of USPS.com. Instead, responses should discuss the particular community's use of USPS.com or at least the level of penetration of broadband that would provide an expectation that USPS.com is a viable option for that community.

- Reduced hours of operation should be considered as an alternative to closure where such reduction better meets community and Postal Service concerns. The importance of considering reduced hours grows with the distance and travel time to a full service post office and when other alternatives are less practical, e.g., little availability to the Internet or banking services.

Table A-1. Eliminated Methodology Proposed for Closure				
Facility Name	Address	City	State	ZIP Code
ANVIK	9998 MAIN ST	ANVIK	AK	99558
ARBON	4351 ARBON VALLEY HWY	ARBON	ID	83212
ARLINGTON	2150 N 700 W	ARLINGTON	IN	46104
BARNARD	210 MAIN ST	BARNARD	SD	57426
BETTLES FIELD	1 FRONT ST	BETTLES FIELD	AK	99726
BIRCHDALE	10424 HIGHWAY 11	BIRCHDALE	MN	56629
BLUE	43287 BLUE RIVER RD	BLUE	AZ	85922
BROOKSTON	100 N 1ST ST	BROOKSTON	TX	75421
BROTHERS	34100 E HIGHWAY 20	BROTHERS	OR	97712
CASTELL	19479 RANCH ROAD 152	CASTELL	TX	76831
CHITINA	400 D ST	CHITINA	AK	99566
CLARKS POINT	11 MAIN ST	CLARKS POINT	AK	99569
CRANE	43140 FOURTH ST	CRANE	OR	97732
CUBERO	6 CAMINO REAL RD	CUBERO	NM	87014
CUTTYHUNK	13A BROADWAY	CUTTYHUNK	MA	2713
DENIO	1 MAIN ST	DENIO	NV	89404
DEPT OF AGRICULTURE	1400 Independence Ave SW	WASHINGTON	DC	20249
DERRY	13125 HIGHWAY 187	DERRY	NM	87933
DOOLE	6662 FM 503	DOOLE	TX	76836
DULLES FINANCE UNIT	44715 PRENTICE DR	STERLING	VA	20163
DUPUYER	110 MONTANA ST	DUPUYER	MT	59432
DURKEE	28677 OLD HWY 30	DURKEE	OR	97905
EGELAND	123 MAIN ST	EGELAND	ND	58331
EIELSON AFB	365 KODIAK ST	EIELSON AFB	AK	99702
ELLIS	26375 HIGHWAY 93	ELLIS	ID	83235
ENNING	17500 HIGHWAY 34	ENNING	SD	57737
FORT WAINWRIGHT	365 KODIAK ST	EIELSON AFB	AK	99702
GARRISON	2 S HIGHWAY 21	GARRISON	UT	84728
GLEN	4800 BOMONT RD	GLEN	WV	25088
GRACE	6858 HIGHWAY 16 W	GRACE	MS	38745
HACHITA	26 B ST	HACHITA	NM	88040
HANKSVILLE	130 E 100 N	HANKSVILLE	UT	84734
HARPER	2965 A ST	HARPER	OR	97906
HASWELL	301 MAIN ST	HASWELL	CO	81045
HEXT	15193 STATE HIGHWAY 29	HEXT	TX	76848
HOGELAND	125 MAIN ST	HOGELAND	MT	59529
HOOPER	51 HAXTON RD	HOOPER	WA	99333
HORSE CREEK	2854 HORSE CREEK RD	HORSE CREEK	WY	82061
HULBERT	10395 S MAPLE ST	HULBERT	MI	49748
IMNAHA	101 HAT POINT RD	IMNAHA	OR	97842
ISLE SAINT GEORGE	165 E TUHAN RD	ISLE SAINT GEORGE	OH	43436
JAY EM	220 AUTUMN ST	JAY EM	WY	82219
JOES	6461 US HIGHWAY 36	JOES	CO	80822
JUNTURA	5828 4TH ST	JUNTURA	OR	97911
LAKE GEORGE	37307 COUNTY 4	LAKE GEORGE	MN	56458
LAKE MINCHUMINA	123 AIRPORT WAY	LAKE MINCHUMINA	AK	99757
LAKESIDE	1000 MAIN ST	LAKESIDE	NE	69351
LANGLEY AFB	62 WALNUT AVE	HAMPTON	VA	23665
LANGTRY	95 TORRES AVE	LANGTRY	TX	78871
LATHAM	209 W BLAINE ST	LATHAM	KS	67072
LAURIER	27007 N HIGHWAY 395 STE 1	LAURIER	WA	99146
LEITER	4679 HIGHWAY 14-16 E	LEITER	WY	82837
LOCO HILLS	3 GOAT ROPER RD	LOCO HILLS	NM	88255
LONG LAKE	1500 STATE HIGHWAY 139	LONG LAKE	WI	54542
LUND	50 S MAIN ST	LUND	NV	89317
MAMMOTH	5873 KELLEYS CREEK RD	MAMMOTH	WV	25132
MANLEY HOT SPRINGS	100 LANDING RD	MANLEY HOT SPRINGS	AK	99756

Table A-1. Eliminated Methodology Proposed for Closure (Continued)				
Facility Name	Address	City	State	ZIP Code
MARLIN	174 N URQUHART AVE	MARLIN	WA	98832
MC CALL CREEK	10790 U S HIGHWAY 84 E	MC CALL CREEK	MS	39647
MELROSE	228 MAIN ST	MELROSE	MT	59743
MILNESAND	4610 NEW MEXICO 206	MILNESAND	NM	88125
MONARCH	15 MISSOULA AVE	MONARCH	MT	59463
MONTELLO	143 FRONT ST	MONTELLO	NV	89830
NEIHART	108 N MAIN ST	NEIHART	MT	59465
NEW PINE CREEK	11166 HIGHWAY 395	NEW PINE CREEK	OR	97635
NIKOLSKI	9998 NIKOLSKI RD	NIKOLSKI	AK	99638
OLD STATION	12529 STATE HIGHWAY 44/89	OLD STATION	CA	96071
ONAKA	123 MAIN ST	ONAKA	SD	57466
ORLA	3737 N HIGHWAY 285	ORLA	TX	79770
PARADISE VALLEY	130 S MAIN ST	PARADISE VALLEY	NV	89426
PENDROY	121 MAIN ST	PENDROY	MT	59467
PENTAGON				
PHILIPP	1277 HIGHWAY 8	PHILIPP	MS	38950
PLATINUM	1 MAIN ST	PLATINUM	AK	99651
POINT BAKER	9998 STATE FLOAT	POINT BAKER	AK	99927
POWDER RIVER	35304 W HIGHWAY 20 26	POWDER RIVER	WY	82648
PYOTE	211 N ROGERS	PYOTE	TX	79777
QUAIL	4239 FM 1547	QUAIL	TX	79251
RARITAN CENTER	400 RARITAN CENTER PKWY STE H	EDISON	NJ	8837
REDIG	14695 US HIGHWAY 85	REDIG	SD	57776
REVA	14759 SD HIGHWAY 20	REVA	SD	57651
RIDGEVIEW	56 RIDGEVIEW HOLLOW RD	RIDGEVIEW	WV	25169
RILEY	105 HIGHWAY 20	RILEY	OR	97758
RINGLING	100 MAIN ST	RINGLING	MT	59642
ROOSEVELT	222 FRONTAGE RD	ROOSEVELT	WA	99356
ROOSEVELT	3861 STATE LOOP 291	ROOSEVELT	TX	76874
ROSE HILL	4699 HIGHWAY 18	ROSE HILL	MS	39357
SASABE	41918 S SASABE HWY	SASABE	AZ	85633
SENECA	112 BARNES AVE	SENECA	OR	97873
SHANIKO	93482 4TH ST	SHANIKO	OR	97057
SHEFFIELD	9584 HIGHWAY 290	SHEFFIELD	TX	79781
SIDNAW	13640 E STATE HIGHWAY M28	SIDNAW	MI	49961
SKWENTNA	100 MAIN ST	SKWENTNA	AK	99667
STEHEKIN	31 DEFACTO LN	STEHEKIN	WA	98852
SUMATRA	2960 SUMATRA HYSHAM RD	SUMATRA	MT	59083
SUMMER LAKE	54128 HIGHWAY 31	SUMMER LAKE	OR	97640
SUPAI	100 MAIN ST	SUPAI	AZ	86435
TAIBAN	32610 US 60	TAIBAN	NM	88134
TALPA	110 2ND ST	TALPA	TX	76882
TARZAN	2764 STATE HIGHWAY 176	TARZAN	TX	79783
TIE SIDING	1741 S US HIGHWAY 287	TIE SIDING	WY	82084
TINNIE	28801 US HIGHWAY 70	TINNIE	NM	88351
TWO BUTTES	448 MAIN ST	TWO BUTTES	CO	81084
VALLECITOS	1484 STATE ROAD 111	VALLECITOS	NM	87581
WALES	500 AIRPORT JUNCTION RD	WALES	AK	99783
WATTON	11729 STATE HIGHWAY M28	WATTON	MI	49970
WEST FORKS	2933 US RTE 201	WEST FORKS	ME	4985
WHITMAN	100 CORROTHER ST	WHITMAN	NE	69366
WISDOM	200 MAIN ST	WISDOM	MT	59761
WISHRAM	521 BRIDGEWAY RD	WISHRAM	WA	98673
WOODWORTH	120 MAIN ST N	WOODWORTH	ND	58496
WPAFB UNIT	5435 HEMLOCK ST BLDG 1226	DAYTON	OH	45433
YONKERS SOUTH	335 S BROADWAY	YONKERS	NY	10705
ZAHL	207 MAIN ST	ZAHL	ND	58856

Table A-1. Postal Facilities Proposed for Closure Excluded Due to Lack of Data				
Facility Name	Address	City	State	ZIP Code
ANVIK	9998 MAIN ST	ANVIK	AK	99558
ARBON	4351 ARBON VALLEY HWY	ARBON	ID	83212
ARLINGTON	2150 N 700 W	ARLINGTON	IN	46104
BARNARD	210 MAIN ST	BARNARD	SD	57426
BETTLES FIELD	1 FRONT ST	BETTLES FIELD	AK	99726
BIRCHDALE	10424 HIGHWAY 11	BIRCHDALE	MN	56629
BLUE	43287 BLUE RIVER RD	BLUE	AZ	85922
BROOKSTON	100 N 1ST ST	BROOKSTON	TX	75421
BROTHERS	34100 E HIGHWAY 20	BROTHERS	OR	97712
CASTELL	19479 RANCH ROAD 152	CASTELL	TX	76831
CHITINA	400 D ST	CHITINA	AK	99566
CLARKS POINT	11 MAIN ST	CLARKS POINT	AK	99569
CRANE	43140 FOURTH ST	CRANE	OR	97732
CUBERO	6 CAMINO REAL RD	CUBERO	NM	87014
CUTTYHUNK	13A BROADWAY	CUTTYHUNK	MA	2713
DENIO	1 MAIN ST	DENIO	NV	89404
DEPT OF AGRICULTURE	1400 INDEPENDENCE AVE SW	WASHINGTON	DC	20249
DERRY	13125 HIGHWAY 187	DERRY	NM	87933
DOOLE	6662 FM 503	DOOLE	TX	76836
DULLES FINANCE UNIT	44715 PRENTICE DR	STERLING	VA	20163
DUPUYER	110 MONTANA ST	DUPUYER	MT	59432
DURKEE	28677 OLD HWY 30	DURKEE	OR	97905
EGELAND	123 MAIN ST	EGELAND	ND	58331
EIELSON AFB	365 KODIAK ST	EIELSON AFB	AK	99702
ELLIS	26375 HIGHWAY 93	ELLIS	ID	83235
ENNING	17500 HIGHWAY 34	ENNING	SD	57737
FORT WAINWRIGHT	365 KODIAK ST	EIELSON AFB	AK	99702
GARRISON	2 S HIGHWAY 21	GARRISON	UT	84728
GLEN	4800 BOMONT RD	GLEN	WV	25088
GRACE	6858 HIGHWAY 16 W	GRACE	MS	38745
HACHITA	26 B ST	HACHITA	NM	88040
HANKSVILLE	130 E 100 N	HANKSVILLE	UT	84734
HARPER	2965 A ST	HARPER	OR	97906
HASWELL	301 MAIN ST	HASWELL	CO	81045
HEXT	15193 STATE HIGHWAY 29	HEXT	TX	76848
HOGELAND	125 MAIN ST	HOGELAND	MT	59529
HOOPER	51 HAXTON RD	HOOPER	WA	99333
HORSE CREEK	2854 HORSE CREEK RD	HORSE CREEK	WY	82061
HULBERT	10395 S MAPLE ST	HULBERT	MI	49748
IMNAHA	101 HAT POINT RD	IMNAHA	OR	97842
ISLE SAINT GEORGE	165 E TUHAN RD	ISLE SAINT GEORGE	OH	43436
JAY EM	220 AUTUMN ST	JAY EM	WY	82219
JOES	6461 US HIGHWAY 36	JOES	CO	80822
JUNTURA	5828 4TH ST	JUNTURA	OR	97911
LAKE GEORGE	37307 COUNTY 4	LAKE GEORGE	MN	56458
LAKE MINCHUMINA	123 AIRPORT WAY	LAKE MINCHUMINA	AK	99757
LAKESIDE	1000 MAIN ST	LAKESIDE	NE	69351
LANGLEY AFB	62 WALNUT AVE	HAMPTON	VA	23665
LANGTRY	95 TORRES AVE	LANGTRY	TX	78871
LATHAM	209 W BLAINE ST	LATHAM	KS	67072
LAURIER	27007 N HIGHWAY 395 STE 1	LAURIER	WA	99146
LEITER	4679 HIGHWAY 14-16 E	LEITER	WY	82837
LOCO HILLS	3 GOAT ROPER RD	LOCO HILLS	NM	88255
LONG LAKE	1500 STATE HIGHWAY 139	LONG LAKE	WI	54542
LUND	50 S MAIN ST	LUND	NV	89317
MAMMOTH	5873 KELLEYS CREEK RD	MAMMOTH	WV	25132
MANLEY HOT SPRINGS	100 LANDING RD	MANLEY HOT SPRINGS	AK	99756
MARLIN	174 N URQUHART AVE	MARLIN	WA	98832

Table A-1. Postal Facilities Proposed for Closure Excluded Due to Lack of Data (Continued)				
Facility Name	Address	City	State	ZIP Code
MC CALL CREEK	10790 U S HIGHWAY 84 E	MC CALL CREEK	MS	39647
MELROSE	228 MAIN ST	MELROSE	MT	59743
MILNESAND	4610 NEW MEXICO 206	MILNESAND	NM	88125
MONARCH	15 MISSOULA AVE	MONARCH	MT	59463
MONTELLO	143 FRONT ST	MONTELLO	NV	89830
NEIHART	108 N MAIN ST	NEIHART	MT	59465
NEW PINE CREEK	11166 HIGHWAY 395	NEW PINE CREEK	OR	97635
NIKOLSKI	9998 NIKOLSKI RD	NIKOLSKI	AK	99638
OLD STATION	12529 STATE HIGHWAY 44/89	OLD STATION	CA	96071
ONAKA	123 MAIN ST	ONAKA	SD	57466
ORLA	3737 N HIGHWAY 285	ORLA	TX	79770
PARADISE VALLEY	130 S MAIN ST	PARADISE VALLEY	NV	89426
PENDROY	121 MAIN ST	PENDROY	MT	59467
PENTAGON				
PHILIPP	1277 HIGHWAY 8	PHILIPP	MS	38950
PLATINUM	1 MAIN ST	PLATINUM	AK	99651
POINT BAKER	9998 STATE FLOAT	POINT BAKER	AK	99927
POWDER RIVER	35304 W HIGHWAY 20 26	POWDER RIVER	WY	82648
PYOTE	211 N ROGERS	PYOTE	TX	79777
QUAIL	4239 FM 1547	QUAIL	TX	79251
RARITAN CENTER	400 RARITAN CENTER PKWY STE H	EDISON	NJ	8837
REDIG	14695 US HIGHWAY 85	REDIG	SD	57776
REVA	14759 SD HIGHWAY 20	REVA	SD	57651
RIDGEVIEW	56 RIDGEVIEW HOLLOW RD	RIDGEVIEW	WV	25169
RILEY	105 HIGHWAY 20	RILEY	OR	97758
RINGLING	100 MAIN ST	RINGLING	MT	59642
ROOSEVELT	222 FRONTAGE RD	ROOSEVELT	WA	99356
ROOSEVELT	3861 STATE LOOP 291	ROOSEVELT	TX	76874
ROSE HILL	4699 HIGHWAY 18	ROSE HILL	MS	39357
SASABE	41918 S SASABE HWY	SASABE	AZ	85633
SENECA	112 BARNES AVE	SENECA	OR	97873
SHANIKO	93482 4TH ST	SHANIKO	OR	97057
SHEFFIELD	9584 HIGHWAY 290	SHEFFIELD	TX	79781
SIDNAW	13640 E STATE HIGHWAY M28	SIDNAW	MI	49961
SKWENTNA	100 MAIN ST	SKWENTNA	AK	99667
STEHEKIN	31 DEFACTO LN	STEHEKIN	WA	98852
SUMATRA	2960 SUMATRA HYSHAM RD	SUMATRA	MT	59083
SUMMER LAKE	54128 HIGHWAY 31	SUMMER LAKE	OR	97640
SUPAI	100 MAIN ST	SUPAI	AZ	86435
TAIBAN	32610 US 60	TAIBAN	NM	88134
TALPA	110 2ND ST	TALPA	TX	76882
TARZAN	2764 STATE HIGHWAY 176	TARZAN	TX	79783
TIE SIDING	1741 S US HIGHWAY 287	TIE SIDING	WY	82084
TINNIE	28801 US HIGHWAY 70	TINNIE	NM	88351
TWO BUTTES	448 MAIN ST	TWO BUTTES	CO	81084
VALLECITOS	1484 STATE ROAD 111	VALLECITOS	NM	87581
WALES	500 AIRPORT JUNCTION RD	WALES	AK	99783
WATTON	11729 STATE HIGHWAY M28	WATTON	MI	49970
WEST FORKS	2933 US RTE 201	WEST FORKS	ME	4985
WHITMAN	100 CORROTHER ST	WHITMAN	NE	69366
WISDOM	200 MAIN ST	WISDOM	MT	59761
WISHRAM	521 BRIDGEWAY RD	WISHRAM	WA	98673
WOODWORTH	120 MAIN ST N	WOODWORTH	ND	58496
WPAFB UNIT	5435 HEMLOCK ST BLDG 1226	DAYTON	OH	45433
YONKERS SOUTH	335 S BROADWAY	YONKERS	NY	10705
ZAHL	207 MAIN ST	ZAHL	ND	58856

Table A-2. Rural Postal Facility Areas by the Percent of Households with Incomes Below $20,000, 2010						
Percent of Households with Incomes Below $20,000	Rural Control Group	Percent by Type of Candidate Facility Area				
		All Rural	Low-Revenue	Declining-Revenue	Lower-Volume Annexes	Non-RAO Stations
0.0% to 10.9%	7.7%	4.7%	4.8%	0.0%	33.3%	2.7%
11.0% to 21.9%	47.2%	37.9%	37.4%	33.3%	66.7%	42.7%
22.0% to 32.9%	34.6%	41.6%	41.6%	66.7%	0.0%	42.7%
33.0% or Higher	10.5%	15.8%	16.2%	0.0%	0.0%	12.0%
Total Areas	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Number of Areas	1,835	2,880	2,647	3	6	225
Average	**21.9%**	**24.3%**	**24.4%**	**21.6%**	**10.3%**	**23.2%**
Note: Twenty control group areas had no household income data.						
Source: ESRI; Partners for Economic Solutions, 2011.						

Table A-3. Rural Postal Facility Areas by the Percentage of Households with No Vehicles, 2010						
Percent of Households with No Vehicles	Rural Control Group	Percent by Type of Candidate Facility Area				
		All Rural	Low-Revenue	Declining-Revenue	Lower-Volume Annexes	Non-RAO Stations
0 .0% to 3.0%	18.3%	25.7%	26.0%	33.3%	16.7%	22.7%
3.1% to 6.1%	39.3%	33.8%	33.6%	0.0%	50.0%	35.6%
6.2% to 9.1%	25.7%	21.1%	20.9%	66.7%	16.7%	22.7%
9.2% or Higher	16.7%	19.5%	19.5%	0.0%	16.7%	19.1%
Total Areas	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Number of Areas	1,835	2,868	2,647	3	6	225
Average	**6.1%**	**6.3%**	**6.3%**	**6.1%**	**6.1%**	**6.4%**
Note: Urban Control Group included one facility area without vehicle data.						
Twenty control group areas and 13 facility areas had no household vehicle data.						
Source: ESRI; Partners for Economic Solutions, 2011.						

Table A-4. Rural Postal Facility Areas by Percent of Population Aged 65 and Over, 2010						
Percent of Population Aged 65 and Over	Rural Control Group	Percent by Type of Candidate Facility Area				
		All Rural	Low-Revenue	Declining-Revenue	Lower-Volume Annexes	Non-RAO Stations
0.0% to 7.9%	1.9%	2.4%	2.5%	0.0%	16.7%	1.8%
8.0% to 15.9%	52.4%	42.9%	42.9%	33.3%	16.7%	44.0%
16.0% to 23.9%	42.0%	50.7%	50.7%	66.7%	16.7%	50.7%
24.0% or Higher	3.7%	4.0%	3.9%	0.0%	50.0%	3.6%
Total Areas	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Number of Areas	1,855	2,881	2,647	3	6	225
Average	**15.9%**	**16.4%**	**16.4%**	**15.8%**	**18.6%**	**16.4%**
Source: ESRI; Partners for Economic Solutions, 2011.						

Table A-5. Rural Postal Facility Areas by the Percentage Minority (Non-White) Population, 2010						
		Percent by Type of Candidate Facility Area				
Percent of Minority Population	Rural Control Group	All Rural	Low-Revenue	Declining-Revenue	Lower-Volume Annexes	Non-RAO Stations
0.0% to 6.9%	51.2%	58.5%	57.8%	0.0%	50.0%	67.1%
7.0% to 13.9%	17.5%	14.1%	14.0%	33.3%	16.7%	15.1%
14.0% to 20.9%	9.4%	8.3%	8.6%	0.0%	0.0%	4.9%
21.0% or Higher	21.9%	19.2%	19.6%	66.7%	33.3%	12.9%
Total Areas	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Number of Areas	1,855	2,881	2,647	3	6	225
Average	**13.9%**	**12.9%**	**13.1%**	**30.0%**	**14.0%**	**10.5%**

Source: ESRI; Partners for Economic Solutions, 2011.

Table A-6. Urban Postal Facility Areas by the Percent of Households with Incomes Below $20,000, 2010						
		Percent by Type of Candidate Facility Area				
Percent of Households with Incomes Below $20,000	Urban Control Group	All Urban	Low-Revenue	Declining-Revenue	Lower-Volume Annexes	Non-RAO Stations
0.0% to 9.7%	25.9%	12.9%	7.0%	13.6%	13.0%	17.2%
9.8% to 19.4%	32.2%	22.8%	22.1%	21.7%	27.2%	17.2%
19.5% to 29.2%	21.9%	22.2%	33.7%	20.1%	18.9%	34.5%
29.3% or Higher	20.0%	42.1%	37.2%	44.7%	40.8%	31.0%
Total Areas	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Number of Areas	1,286	658	86	374	169	29
Average	**19.4%**	**27.0%**	**26.1%**	**27.4%**	**26.8%**	**25.5%**

Note: Urban Control Group included two facility areas without household income data.
Source: ESRI; Partners for Economic Solutions, 2011.

Table A-7. Urban Postal Facility Areas by the Percentage of Households with No Vehicles, 2010						
		Percent by Type of Candidate Facility Area				
Percent of Households with No Vehicles	Urban Control Group	All Urban	Low-Revenue	Declining-Revenue	Lower-Volume Annexes	Non-RAO Stations
0 .0% to 5.4%	38.6%	17.4%	37.2%	13.9%	11.8%	34.5%
5.5% to 10.8%	28.2%	16.4%	27.9%	17.2%	7.7%	24.1%
10.9% to 16.3%	14.2%	16.3%	12.8%	18.5%	13.6%	13.8%
16.4% to 21.6%	6.7%	12.3%	15.1%	12.1%	11.8%	10.3%
21.7% or Higher	12.3%	37.6%	7.0%	38.3%	55.0%	17.2%
Total Areas	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Number of Areas	1,286	657	86	373	169	29
Average	**10.8%**	**21.1%**	**9.5%**	**15.4%**	**27.1%**	**13.2%**

Note: Urban facility areas included one facility area without vehicle data.
Urban Control Group included two facility areas without household income data.
Source: ESRI; Partners for Economic Solutions, 2011.

Table A-8. Urban Postal Facility Areas by Percent of Population Aged 65 and Over, 2010						
		Percent by Type of Candidate Facility Area				
Percent of Population Aged 65 and Over	Urban Control Group	All Urban	Low-Revenue	Declining-Revenue	Lower-Volume Annexes	Non-RAO Stations
0.0% to 7.0%	9.5%	11.4%	4.7%	12.8%	12.4%	6.9%
7.1% to 14.1%	32.1%	50.8%	31.4%	54.8%	55.0%	31.0%
14.2% to 21.2%	48.8%	29.2%	52.3%	25.4%	23.1%	44.8%
21.3% or Higher	9.6%	8.7%	11.6%	7.0%	9.5%	17.2%
Total Areas	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Number of Areas	1,288	658	86	374	169	29
Average	**14.1%**	**13.4%**	**15.7%**	**12.7%**	**13.3%**	**15.1%**

Source: ESRI; Partners for Economic Solutions, 2011.

Table A-9. Urban Postal Facility Areas by the Percentage Minority (Non-White) Population, 2010						
		Percent by Type of Candidate Facility Area				
Percent of Minority Population	Urban Control Group	All Urban	Low-Revenue	Declining-Revenue	Lower-Volume Annexes	Non-RAO Stations
0.0% to 13.1%	38.3%	20.1%	69.8%	11.0%	10.1%	48.3%
13.2% to 26.3%	21.5%	15.2%	15.1%	13.9%	19.5%	6.9%
26.4% to 39.4%	16.0%	10.8%	2.3%	9.4%	17.2%	17.2%
39.5% to 52.6%	9.2%	11.2%	2.3%	11.2%	16.0%	10.3%
52.7% or Higher	15.1%	42.7%	10.5%	54.5%	37.3%	17.2%
Total Areas	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Number of Areas	1,288	658	86	374	169	29
Average	**26.3%**	**45.7%**	**15.4%**	**54.8%**	**43.8%**	**26.1%**

Source: ESRI; Partners for Economic Solutions, 2011.